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April 17, 2013

Ms. Angelica Deniz
United States Probation Officer
United States Probation Department
Eastern District of New York
147 Pierrepont Street
Brooklyn, New York 11201

United States v. Eleuterio Granados Hernandez
Criminal Docket No. 11-297 (S-5)-01

Dear Ms. Deniz:

On behalf of my client, Eleuterio Granados Hernandez, and pursuant to Federal Rule 32, I am stating my objections to the Presentence Investigation Report prepared by you.

1. As set forth in the plea agreement and between the parties, there is nothing to indicate that Jane Doe #2, Jane Doe #3, Jane Doe #5, or Jane Doe #12, would qualify under the Guidelines as "vulnerable victims", pursuant to Guideline 3A1.1, Application Note 2. Therefore Mr. Grenados Hernandez objects to the two level enhancement as applied to each of these four victims.

2. The resulting Adjusted Offense Level, without the enhancement, is:

| | <u>Unit</u> |
|------------------------|-------------|
| Jane Doe #2.....37 | 1 |
| Jane Doe #3.....37 | +1 |
| Jane Doe #5.....37 | +1 |
| Jane Doe #11.....38 | +1 |
| Jane Doe #12.....37 | <u>+1</u> |
| Total Units: | 5 |
| Highest Offense Level: | 38 |
| Level Increase: | <u>4</u> |
| Total Offense Level: | 42 |

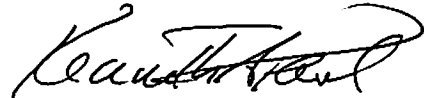
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With the adjustment of three levels for Acceptance of Responsibility and the agreed upon one level adjustment for Global Plea, the Total Offense Level is 38 with a range of imprisonment of 235 to 293 months.

I would respectfully request that enclosed information is reflected in you Revised Presentencing Investigation Report.

If you have any questions regarding this matter, please feel free to call me. Thank you for your consideration.

Yours truly,

A handwritten signature in black ink, appearing to read 'Kenneth A. Paul', with a large, stylized flourish at the end.

Kenneth A. Paul

KAP:ng

Cc: Honorable Kiyo A Matsumoto (Via ECF and Regular Mail)
AUSA Soumya Dayananda (Via ECF)